Attorney Docket No. 52493.000129
GE Docket No. 2000-075
Application Serial No. 09/749,941

REMARKS

The Office Action mailed December 17, 2003 has been reviewed and its contents

carefully considered. Claims 1-36 are pending in the present application. By this amendment,

claims 1, 11, 18 and 28 are amended and claims 35 and 36 are added.

No new matter is added by this amendment. In particular, support for the amendments

may be found in the present application on page 8, line 9 - page 9, line 2, for example. For the

reasons set forth in detail below, it is respectfully submitted that the applied art fails to teach or

suggest the claimed invention.

A.   The Rejection under 35 U.S.C. §103

The Office Action asserts that claims 1- 34 are rejected under 35 U.S.C. 103(a) as being

unpatentable over U.S. Patent 6,151,608 to Abrams and further in view of U.S. Patent 5,452,449

to Baldwin, Jr. et al (Baldwin).

For example, the Office Action asserts that as per claims 1, 18, Abrams discloses

receiving one or more enhancements from a developer (Abrams, col 19, lines 20-24 - col 20 lines

1-13, col 18 lines 43-67); generating at least one trigger file associated with the one or more

enhancements (Abrams, col 12, lines 6, lines 28-32, col 12 lines 1-4) where at least one trigger

files is generated based on information associated with the one or more enhancements (col 6

lines 28-58); migrating the one or more enhancements ... trigger file (Abstract, col 6 lines 2858,

col 15 lines 5-20); and receiving an indication... successful (col 15 lines 35-60), "the invention

verifies the changed data and ensures consistency with the data of the destination table." Further,

the Office Action appears to assert that Abrams inherently teaches receiving an indication of

14

Attorney Docket No. 52493.000129
GE Docket No. 2000-075
Application Serial No. 09/749,941

whether the step of migrating the one or more enhancements was successful as claimed. However, the Office Action asserts that Abrams does not specifically disclose the system comprises one or more program modules and the enhancement comprises at least one of modifying one or more program modules. The Office Action then attempts to cure this deficiency by the teachings of Baldwin. The Office Action asserts that Baldwin discloses a system that comprises one or more program modules.

Applicant respectfully asserts that Abrams and Baldwin fail to teach or suggest the claimed invention as now recited in independent claim 1. That is, even if it were obvious to combine the teachings of Abrams and Baldwin in some manner, which it is not, the combined teachings would not teach the claimed invention.

To explain, amended claim 1 recites, in particular, generating at least one trigger file associated with the one or more enhancements, where the at least one trigger file is generated based on information associated with the one or more enhancements and the trigger file includes instructions for migrating the enhancements and the one or more enhancements, **the trigger file including a schedule for migrating the enhancement and identification of a software system to receive the migration, the process including looking for the trigger file to determine whether any changes are scheduled.** Accordingly, claim 1 is amended to further define the nature of the claimed trigger file.

Abrams fails to teach of suggest such specifics. Abrams teaches a method and system to migrate data from one or more ASCII files and/or from one or more relational databases to one or more relational database tables without the need to write code. In doing so, the Abrams'

15

invention allows the user to define mapping templates and conditionals to assist in translating and transforming data values.

For example, in column 12, lines 5-34, Abrams describes there are two approaches to loading the data into a temporary table depending on whether the source data is in an ASCII file or whether it resides in another Oracle table. For data originating from a non-Oracle source, Abrams provides a format for an ASCII file into which the user can extract data from a non-Oracle source and use SQL*Loader to insert the data into an Oracle temporary table. Before the Abrams' invention, Abrams describes the user had to write validations, translations, and change the format of the data as part of coding the SQL*Loader script. Abrams describes that using the Abrams' invention, however, the user only needs to create an extract table and dump it into the temporary Oracle table. For source data originating in an Oracle table, the Abrams' invention uses an automatic upload process to load the source table to the temporary table.

In column 2, Abrams further teaches that a Data Map Architect provides a format to associate the data in the source system (which reside in temporary tables) with the data in destination system. The Data Map Architect uses knowledge about the characteristics, structure, and format of data in the destination tables to facilitate the match between the source data and the destination table. Based on the characteristics of the destination table, the Data Map Architect creates intermediate tables. Abrams teaches that the tables and fields of the temporary tables are linked to the tables and fields of the intermediate tables which are identical to the tables and fields of the destination tables.

16

However, the above teachings of Abrams fail to teach or suggest the particulars of the claimed invention relating to the trigger file. Of note, Applicant acknowledges that Abrams teaches that a user can specify an order in which the batches are run and can schedule a time for the batch run or can schedule periodic batch runs (9:00 a.m. every Monday for three months). Abrams describes that utilizing batches allows the user to optimize performance and also to reduce the resource contentions during peak times. Abrams in column 13, lines 12-17.

This teachings of using a schedule is of course to be expected as known in the art. However, the features of claim 1 are different. That is, claim 1 recites the trigger file including a schedule for migrating the enhancement and identification of the software system to receive the migration, the process including looking for the trigger file to determine whether any changes are scheduled. It is in particular the recited "looking" that is not taught or suggested by Abrams.

Applicant of course appreciates that the applied rejection under 35 U.S.C. § 103 relies on both the teachings of Abrams and Baldwin. However, it is submitted that Baldwin fails to cure the above deficiencies of Abrams. As discussed in the Office Action, Baldwin is directed toward the use of language program modules. For example, in column 1, Baldwin teaches the Baldwin invention relates to systems for analyzing computer high-level language program modules, including their inter-module relationships; and that the Baldwin invention further relates to a system for creating databases used in such program analysis systems.

However, Applicant respectfully submits that these teachings of Baldwin, as well as the other teachings of Baldwin, fail to cure the deficiencies of Abrams as discussed above. Accordingly, it is submitted that Abrams, either alone or in combination with Baldwin, fails to

17

Attorney Docket No. 52493.000129
GE Docket No. 2000-075
Application Serial No. 09/749,941

teach or suggest the claimed invention as recited in claim 1. Further, it is submitted that claims 11, 18 and 28 are allowable for reasons similar to those set forth above with respect to claim 1.

Applicant further submits that the various dependent claims are allowable at least for the reasons set forth above, as well as for the further features that such dependent claims recite. For example, claims 35 and 36 have been added to further recite features relating to the nature of the trigger file. Withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

B.   Conclusion

For at least the reasons outlined above, Applicant respectfully asserts that the application is in condition for allowance. Favorable reconsideration and allowance of the claims are respectfully solicited.

Should the Examiner believe anything further is desirable in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

For any fees due in connection with filing this Response the Commissioner is hereby authorized to charge the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,
HUNTON & WILLIAMS
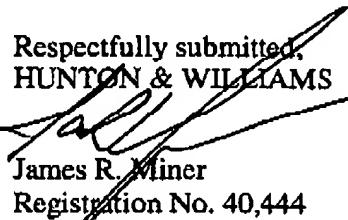
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18